

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JAMES W. JACKSON,  
Defendant.

Criminal Case No. CR 21-120WES

In violation of:  
18 U.S.C. § 2252(a)(2)  
(Receipt of Child Pornography)  
18 U.S.C. § 2252(a)(4)(B)  
(Possession of Child Pornography)

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

**(Receipt of Child Pornography)**

On or about October 30, 2021, in the District of Rhode Island and elsewhere, the  
defendant

**JAMES W. JACKSON**

did knowingly receive any visual depiction of a minor engaging in sexually explicit  
conduct using any means and facility of interstate and foreign commerce, and that had  
been mailed, and had been shipped and transported in and affecting interstate and  
foreign commerce, and which contained materials which had been mailed, shipped, and  
transported, by any means including by computer, and the production of such visual  
depiction involved the use of a minor engaging in sexually explicit conduct and the  
visual depiction was of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

**COUNT TWO**

**(Possession of Child Pornography)**

On or about October 30, 2021 in the District of Rhode Island and elsewhere, the defendant

**JAMES W. JACKSON**

did knowingly possess, and access with intent to view, one or more matters which contained a visual depiction, that had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, including by computer, the production of which involved the use of a minor who had not attained 12 of age engaging in sexually explicit conduct, and the visual depiction was of such conduct.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).


**FORFEITURE ALLEGATIONS**


Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to defendant JAMES W. JACKSON ("JACKSON") that in the event that defendant JACKSON is convicted of any count of this Indictment, defendant JACKSON shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), all property, real or personal, used or intended to be used to commit or promote the commission of the said offense, all property

constituting or traceable to gross profits or other proceeds obtained from such offense, and all visual depictions described in 18 U.S.C. §§ 2251-2252, and any book, magazine, periodical, film, videotape, or other matter containing any such visual depiction, which was produced, transported, mailed, shipped, or received in committing such offense.

All in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853, and Rule 32.2(a), Federal Rules of Criminal Procedure.

RICHARD B. MYRUS  
Acting United States Attorney

  
JOHN P. McADAMS  
Assistant U.S. Attorney

  
LEE H. VILKER  
Assistant U.S. Attorney  
Criminal Division Deputy Chief

A TRUE BILL:

  
Grand Jury Foreperson

Date: 12/01/2021